

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE GEORGIA SENATE BILL 202

MASTER CASE NO.
1:12-MI-55555-JPB

CONSENT MOTION FOR ENTRY OF ESI ORDER

Plaintiffs move, with the consent of all Defendants and Intervenor-Defendants, for entry of a proposed stipulation and order among the Plaintiffs, State Defendants,¹ the District Attorney for Dougherty County, and Intervenor-Defendants² governing production of electronically stored information (“ESI”) in these actions. The Plaintiffs, State Defendants, the District Attorney for Dougherty County, and Intervenor-Defendants have negotiated and reached agreement on the proposed ESI agreement attached as Exhibit 1.

¹ The “State Defendants” are the State of Georgia, Brian Kemp in his official capacity as Governor of Georgia, Brad Raffensperger in his official capacity as Secretary of State of Georgia, the Georgia State Election Board, and Edward Lindsey, Janice W. Johnston, Sara Tindall Ghazal, and Matthew Mashburn in their official capacities as members of the Georgia State Election Board.

² The “Intervenor-Defendants” are the Republican National Committee, National Republican Senatorial Committee, National Republican Congressional Committee, and Georgia Republican Party, Inc.

Plaintiffs and County Defendants³ continue to negotiate in good faith to come to an agreement to govern the production of ESI. Plaintiffs and County Defendants believe they will be able to come to an agreement, and they consent to the entry of a separate order governing production of ESI among the other parties while they continue to negotiate.

Accordingly, in order for discovery to continue proceeding without delay, Plaintiffs, with the consent of Defendants and Intervenor-Defendants, respectfully request that the Court enter the proposed stipulated ESI agreement filed contemporaneously herewith.

Respectfully submitted this 18th day of March, 2022.

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/s/ Aileen Bell Hughes

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³ The “County Defendants” are the Fulton County Solicitor and the county election officials and county election offices named as defendants in the following cases: *The New Georgia Project et al. v. Raffensperger et al.*, Case No. 21-cv-01229-JPB; *Georgia State Conference of the NAACP et al. v. Raffensperger et al.*, Case No. 21-cv-01259-JPB; *Sixth District of the African Methodist Episcopal Church et al. v. Kemp et al.*, Case No. 1:21-CV-01284-JPB; *Asian Americans Advancing Justice-Atlanta, et al. v. Raffensperger et al.*, Case No. 1:21-cv-01333-JPB. Here, the “County Defendants” does not include the District Attorney for Dougherty County.

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing Consent Motion for Entry of ESI Order has been prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(C).

/s/ Maura Eileen O'Connor
Maura Eileen O'Connor

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2022, I filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record in this case.

/s/ Maura Eileen O'Connor
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